

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA**

**ASHEVILLE DIVISION**

CARYN DEVINS STRICKLAND, )  
                                )  
                                )  
*Plaintiff,*              )  
                                )  
v.                             ) Civil No. 1:20-cv-00066-WGY  
                                )  
UNITED STATES, *et al.*,    )  
                                )  
*Defendants.*              )

**PLAINTIFF'S MOTION TO SEAL**

Plaintiff respectfully requests leave to file her unredacted response to Defendants' "Motion to Strike Privilege Assertion and to Compel Deposition Testimony" and Exhibits A–D under seal. Plaintiff's response and accompanying exhibits are filed at ECF No. 226. This Court previously granted Defendants' Motion to Seal information related to Plaintiff's privilege assertion, and it should allow Plaintiff to file an unredacted version of her response memorandum and accompanying exhibits for the same reasons. ECF No. 213; Entry Order Dated May 19, 2023. Moreover, Plaintiff has filed a Motion for a Protective Order based on the same subject matter, and an order granting that motion would provide another basis to keep the materials permanently under seal. ECF No. 227.

Additionally, in Exhibit C, Plaintiff has redacted the name of a non-party individual to avoid disclosure of confidential personnel information related to that person. *See Johnson v. City of Fayetteville*, No. 5:12-CV-456-F, 2014 WL 7151147, at \*9 (E.D.N.C. Dec. 11, 2014) (recognizing "the privacy interests in a non-party's personnel file").

Prior to filing this motion, Plaintiff conferred with Defendants as required by Local Rule

7.1. Defendants do not oppose Plaintiff's motion to seal.

This the 30th day of May, 2023.

Respectfully Submitted,

/s/ Cooper Strickland

Cooper Strickland  
P.O. Box 92  
Lynn, NC 28750  
Tel. (828) 817-3703  
cooper.strickland@gmail.com

*Counsel for Plaintiff*

## CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of May, 2023, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Joshua M. Kolsky at Joshua.Kolsky@usdoj.gov

Rachael Westmoreland at Rachael.Westmoreland@usdoj.gov

Madeline M. McMahon at madeline.m.mcmahon@usdoj.gov

Danielle Young at Danielle.young2@usdoj.gov

/s/ Cooper Strickland

Cooper Strickland

N.C. Bar No. 43242

P.O. Box 92

Lynn, NC 28750

Tel. (828) 817-3703

cooper.strickland@gmail.com